

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

Garden Oaks Maintenance Org, Inc.
DEBTOR

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CASE NO. 18-60018

**DEBTOR'S MOTION TO EXTEND TIME TO FILE STATEMENTS,
SCHEDULES AND RELATED REQUIRED DOCUMENTS**

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE THAN TWENTY-ONE (21) DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO RESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPONSE BEFORE THE RESPONSE TIME EXPIRES.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Garden Oaks Maintenance Organization, LLC, Debtor and Debtor-In-Possession, and files this *Motion To Extend Time To File Statements, Schedules and Related Required Documents* (the "Motion") and in support would respectfully show:

1. This voluntary Chapter 11 was filed on April 11, 2018.
2. The Debtor filed its Petition, and uploaded its creditor's matrix at that time.
3. The Debtor operates as a homeowners association, with volunteer officers and directors, each generally with other full time employment and responsibilities.
4. The Debtor's schedules, statements and other required documents and pleadings are substantially completed, however due to full-time employment and family obligations, and counsel's schedule, final review and execution of the Schedules has not occurred.
5. Debtor requests a short extension (until May 4, 2018) to file its Schedules, Statement of Financial Affairs, and related information with the Court.

WHEREFORE, the Debtor requests the Court to enter an Order extending the time for it to file all required schedules, statement of financial affairs and other documentation required by the Bankruptcy Code and Rules and to grant it such other and further relief, at law or in equity, to which it may be entitled.

Dated: April 27, 2018

Respectfully submitted,

By: /s/ Johnie Patterson

Johnie Patterson

PROPOSED COUNSEL FOR THE DEBTOR

SBN 15601700

OF COUNSEL:

WALKER & PATTERSON, P.C.

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CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Motion was posted on the Debtor's website, served upon all entities requesting notice, and served electronically on all parties participating in the Court's CM/ECF system on April 27, 2018

/s/Johnie Patterson
Johnie Patterson